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Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

No. CR 18-759-CJC-1

14 Plaintiff,

EX PARTE APPLICATION FOR UNSEALING
OF ARREST WARRANT; DECLARATION OF
15 SOLOMON KIM

15 v.

16 ROBERT RUNDO et al.,

17 Defendants.
18

19 The government hereby applies, ex parte, for an order
20 permitting the unsealing of the arrest warrant as to defendant
21 Robert RUNDO arising from the First Superseding Indictment so that
22 the government may provide a copy of the warrant to Romanian
23 authorities for the purpose of extraditing defendant RUNDO to the
24 United States. Counsel for defendant RUNDO takes no position on
25 this application.
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1 This ex parte application is based upon the attached
2 declaration of Solomon Kim.

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4 Dated: April 19, 2023

Respectfully submitted,

5 E. MARTIN ESTRADA
United States Attorney

6 ANNAMARTINE SALICK
7 Assistant United States Attorney
Chief, National Security Division

8
9 /s/

10 SOLOMON KIM
KATHRYNNE N. SEIDEN
Assistant United States Attorneys

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA
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DECLARATION OF SOLOMON KIM

I, Solomon Kim, declare as follows:

1. I am an Assistant United States Attorney ("AUSA") in the United States Attorney's Office for the Central District of California. I am one of the AUSAs assigned to represent the government in United States v. Robert Rundo et al., CR 18-759-CJC.

2. On January 4, 2023, the government obtained a first superseding indictment in this case, charging defendant and others with violations of: (1) 18 U.S.C. § 371 (Conspiracy); and (2) 18 § 2101 (Rioting). In connection with the indictment, the Court issued an arrest warrant for defendant Robert RUNDO, which is currently under seal.

3. On March 29, 2023, defendant RUNDO was arrested in Romania.

4. The government is in the process of submitting an application to Romania for the extradition of defendant RUNDO to the United States. As part of the application, the government is required to provide a certified copy of defendant RUNDO's arrest warrant to Romania.

5. Accordingly, the government requests that the Court issue an order permitting the unsealing of defendant RUNDO's arrest warrant.

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